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September 2, 2020

**VIA ECF**

Honorable Paul A. Engelmayer, U.S.D.J.  
United States District Judge  
Thurgood Marshall  
United States Courthouse  
40 Foley Square, Courtroom 1305  
New York, New York 10007

**RE:** *Paroni, Elodie & Est. of Eugene v. Alstom SA, et al.*  
**Civil Action Number: 1:19-cv-01034-PAE**

Dear Judge Engelmayer:

In response to your Order, dated September 1, 2020 (Doc. 46), the parties have communicated, and jointly propose the below scheduling order for your consideration:

1. Plaintiff to file leave to serve amended Complaint (defense consents) no later than 9/8/2020;
2. Plaintiff to serve amended Complaint on General Electric UK Holdings Ltd. no later than 9/15/2020;
3. Plaintiff to propound written discovery no later than 9/15/2020;
4. Defendant to respond to written discovery no later than 10/13/2020;
5. Plaintiff must notice any depositions no later than 10/16/2020 (deposition, if noticed, to be conducted during the week of 10/19 and 10/26);
6. Jurisdictional discovery ends on 10/30/2020;
7. Plaintiff's letter indicating whether she will continue to pursue this action is due 11/6/2020;
8. General Electric UK Holdings Ltd.'s motion to dismiss for lack of personal jurisdiction, if any, is due 11//20/2020;
9. Plaintiff's opposition is due 12/4/2020;
10. General Electric UK Holdings Ltd.'s reply is due 12/11/2020.

We appreciate the Court's time and consideration in this matter.

Respectfully,

TANENBAUM KEALE LLP

**Dennis E. Vega**  
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CC: Plaintiff's Counsel (via ECF)

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